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FILED
DISTRICT COURT OF GUAM

NOV 05 2009 *Sign*

JEANNE G. QUINATA
CLERK OF COURT

IN THE DISTRICT COURT OF GUAM

DEBBIE ANN REYES PEREZ,)	CIVIL CASE NO. CV08-00007
)	
)	
)	MOTION FOR RECONSIDERATION,
Plaintiff,)	OR IN THE ALTERNATIVE, FOR
)	(1) AN ORDER SPECIFYING WHAT
vs.)	FACTS ARE NOT GENUINELY AT
)	ISSUE, AND (2) ORDERS <i>IN LIMINE</i>
SUPERIOR COURT OF GUAM,)	
)	
)	
Defendant.)	
_____)	

MOTION


The Superior Court moves for reconsideration of this Court's Decision and Order denying its motion for summary judgment. The motion is supported by Rule 54(b) of the Federal Rules of Civil Procedure, Rule 7.1(i) of this Court's Local Rules of Practice, and the

ORIGINAL

inherent and well-established authority of federal district courts to modify their own interlocutory orders at any times while they retain jurisdiction over a case. In the event the motion for reconsideration is denied, for trial purposes the Superior Court moves pursuant to Fed.R.Civ.P. 56(d) for an order specifying what facts are not genuinely at issue. The Superior Court also moves for an order *in limine* on evidence of any harassment that may have occurred before February 16, 2006. Perez has not disputed that the Superior Court had no notice of any harassment before that date. Alternatively, pursuant to 42 USCS § 2000e-5(e)(1), which is the statute of limitations for Title VII, the Superior Court moves for an order *in limine* on proof of any alleged harassment that may have occurred prior to November 28, 2005, which was one hundred and eighty days prior to the day Perez filed her EEOC charge on May 27, 2006.


DOOLEY ROBERTS & FOWLER LLP

Dated: 11/04/09

By: 
TIM ROBERTS, Esq.
Attorney for Defendant
Superior Court of Guam

SUPERIOR COURT OF GUAM

Dated: 11-4-09

By: 
B. ANN KEITH, Esq.
Attorney for Defendant
Superior Court of Guam